

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION - CLEVELAND

IN RE:)
) CASE NO. 17-11220
)
Margaret R. Losito) CHAPTER 7
)
Debtor) JUDGE Jessica Price Smith
)
) **OBJECTION TO CONFIRMATION**
) **OF THE CHAPTER 13 PLAN**
)

Now comes Ally Financial, a creditor herein holding a secured claim in the within proceedings, by and through counsel, pursuant to 11 U.S.C, Section 1324 and objects to the confirmation of the plan, based upon the proposed valuation of the collateral for the following reasons:

1. The within case was filed on March 8, 2017 and is governed by BAPCPA of 2005.

2. Creditor has a security interest in a 2015 Chevrolet Cruze VIN# 1G1PB5SH6F7134142.

3. On January 10, 2015, the Debtor listed above obtained a loan from Creditor for the purchase of said 2015 Chevrolet Cruze.

4. The monthly payment amount is \$378.23 and Creditor is owed \$17,536.93.

5. The debt was incurred within the 910-day period preceding the filing of the case; therefore, pursuant to 11 U.S.C. § 1325(a) Creditor should be paid in full in the amount of \$17,536.93.

6. Debtor shall provide Creditor with proof of insurance for the 2015 Chevrolet Cruze prior to the confirmation of the Chapter 13 Plan.

7. The objection that is raised herewith is a standing objection and shall continue with reference to the currently proposed plan and any subsequently modified plan or plans.

WHEREFORE, Creditor prays that this Court deny confirmation of the Debtor(s) proposed Chapter 13 Plan.

Respectfully Submitted;

/s/ Edward A. Bailey
Reimer Law Co.
BY: Peter M. O'Grady #0093349
BY: Cynthia A. Jeffrey #0062718
BY: Edward A. Bailey #0068073
P.O. Box 39696
30455 Solon Road
Solon, OH 44139
Phone: (440) 600-5500
Fax: (440) 600-5522
Attorneys for Creditor
ebailey@reimerlaw.com

Notice of Hearing

Parties in interest shall take notice that the within
Objection of Ally Financial to Confirmation of Chapter 13 Plan
shall come on for hearing on May 25, 2017 at 9:30 a.m., in
conjunction with the confirmation hearing in the within matter.

/s/ Edward A. Bailey

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Attorneys for Creditor

ebailey@reimerlaw.com

CERTIFICATE OF SERVICE

I certify that on May 1, 2017, a true and correct copy of the Objection was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the court's Electronic Mail Notice List:

1. Office of the U.S. Trustee at (registered address)@usdoj.gov
2. Craig H. Shopneck on behalf of the Chapter 7 Trustee's office at ch13shopneck@ch13cleve.com
3. William Balena, Esq. on behalf of Margaret R. Losito, Debtor, at docket@ohbksource.com

And by regular U.S. mail, postage prepaid, to:

1. Margaret R. Losito, Debtor
2331 Washington Ave, #73
Lorain, OH 44052

/s/ Edward A. Bailey

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